

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al.,	§	
	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	
	§	(Jointly Administered)

**ATLANTIC MARITIME SERVICES LLC'S
RESERVATION OF RIGHTS WITH REGARD TO
DEBTORS' MOTION TO APPROVE DISCLOSURE STATEMENT**

[Related to ECF No. 724]

Now, through undersigned counsel, comes Atlantic Maritime Services LLC (“*Atlantic*”) and files this Reservation of Rights with regard to the *Motion of Debtors for Entry of Order (I) Approving Disclosure Statement and Form and Manner of Notice of Disclosure Statement Hearing; (II) Establishing Solicitation and Voting Procedures; (III) Scheduling Confirmation Hearing; (IV) Establishing Notice and Objection Procedures for Confirmation of the Proposed Plan; (V) Approving Notice and Objection Procedures for the Assumption of Executory Contracts and Unexpired Leases; (VI) Approving Procedures for Objections to the Assignment and Transfer of Property of the Estate; (VII) Approving Bid Submission Deadline and Procedures for Submission of Higher or Better Bids; and (VIII) Granting Related Relief* (Dkt. No. 724) (the “*Disclosure Statement Motion*”), and respectfully represents as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

STATEMENT AND RESERVATION OF RIGHTS²

1. Atlantic does not object at this time to the approval of the Disclosure Statement. However, Atlantic reserves all of its rights with respect to the Plan, including but not limited to: (i) its right to object to confirmation of the Plan or any other chapter 11 plan, (ii) its right to opt out of third-party releases, whether incorporated into the Plan or any other document, and (iii) to the extent Atlantic is impacted in any way by the contents of any supplements or amendments to the Disclosure Statement or the Plan that may be filed after any deadline for objecting to the Disclosure Statement or confirmation of the Plan, Atlantic reserves the right to object thereto on any basis whatsoever.

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² Capitalized terms used and not defined herein have the meanings given to them in the Debtors' *Joint Chapter 11 Plan of Fieldwood Energy LLC and Its Affiliated Debtors* [Dkt No. 722].

Respectfully submitted,

Houston, Texas
March 11, 2021

/s/ Stewart F. Peck

**LUGENBUHL, WHEATON, PECK, RANKIN
& HUBBARD**

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*Co-Counsel to Valaris plc and Atlantic Maritime
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a true and correct copy of the above and foregoing via Notice of Electronic Filing on this 11th day of March 2021.

/s/ Stewart F. Peck

Stewart F. Peck